

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<b>In Re:</b>	)	
	)	<b>Chapter 7</b>
<b>PHILLIP P. &amp; ATHENA M.</b>	)	
<b>PAWLOWSKI</b>	)	<b>08 B 72055</b>
	)	
<b>Debtor(s)</b>	)	<b>Judge Barbosa</b>

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**NOTICE OF MOTION FOR REDEMPTION**

**To:** **Office of United States Trustee**, 211 S Court St, Ste 873, Rockford, IL 61101  
**Trustee:** Daniel M. Donahue, 6735 Vistagreen Way, Rockford IL 61107  
**Debtor:** Phillip P. & Athena M. Pawlowski, 246 Rochester Rd, Poplar Grove, IL 61065  
**Registered Agent:** Daimler Chrysler Financial Services Americas LLC c/o The Corporation Company, 600 S 2<sup>nd</sup> St, Ste 103, Springfield, IL 62704  
**Creditor:** Chrylser Financial, PO Box 8065, Royal Oak, MI 48068  
**Secured Creditor's Attorney:** Kathryn A. Klein, 7700 Bonhomme, 7<sup>th</sup> Floor, St. Louis, MO 631005

PLEASE TAKE NOTICE that on August 13, 2008 at 9:30 AM, as soon thereafter as I may be heard, I shall appear before the Honorable Judge Barbosa or any other Bankruptcy Judge presiding in his or her place in Courtroom 115 of the Federal Courthouse, 211 S Court St Rockford IL on the attached motion, and shall request that the attached Order be entered, at which time you may appear if so desired.

**PROOF OF SERVICE**

I, The undersigned, an attorney, hereby certify that I have served a copy of this Notice along with the attached Motion upon the parties listed above, as to the Trustee's counsel via electronic filing through ECF on July 23, 2008 and as to the Debtor, Creditor, and Registered Agent by causing the same to be mailed in a properly addressed envelope, postage prepaid, in the U.S.Mail at 233 S Wacker Dr Ste 5150 Chicago, Illinois, 60606, before 5:00 p.m., on July 23, 2008.

/s/ Ben W. Koyl  
Ben W. Koyl  
Legal Helpers, PC  
233 S Wacker Dr, Ste 5150  
Chicago, IL 60606

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**MOTION FOR REDEMPTION UNDER 11 U.S.C. 722**

NOW COMES Debtor, by and through counsel Legal Helpers, P.C., and moves this Honorable Court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order and states in support thereof:

1. The item to be redeemed is tangible personal property intended primarily for personal, family or household use, and is more particularly described as 2005 Kia Sorento, VIN#: KNDJC733755451737.
2. The interest of the Debtor(s) in such property is exempt or has been abandoned by the estate and the debt which is secured by said property to the extent of the allowed secured claim of the Creditor is a dischargeable consumer debt.
3. The allowed secured claim of Chrysler Financial, for purposes of redemption, the "redemption value", should be determined to be not more than \$8,250.00 as evidenced by the written vehicle condition report, attached as Exhibit A, and incorporated as is fully stated herein.
4. Arrangements have been made by the Debtor(s) to pay Chrysler Financial up to the aforesaid amount in a lump sum should this order of redemption be entered.
5. The 2005 Kia Sorento is of inconsequential value or benefit to the estate.

WHEREFORE Debtor(s) prays this Honorable Court enter an order:

- A. Requiring Chrysler Financial to accept from Debtor(s) the lump sum payment of \$8,250.00 the redemption value, and;
- B. Requiring Chrysler Financial to release its lien of record against the 2005 Kia Sorento, VIN # KNDJC33755451737.
- C. Allowing Debtor to redeem the subject property by paying to the creditor the redemption amount on or before the 30th day following entry of the order.

Respectfully Submitted,

/s/ Ben W. Koyl

Ben W. Koyl

Legal Helpers, P.C.

233 S Wacker Dr, Ste 5150

Chicago, IL 60606